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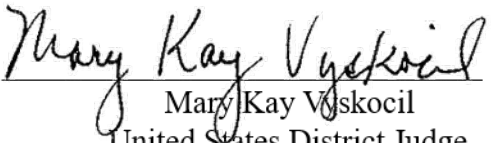
Via: ECF

April 14, 2022

Honorable Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

Discovery is extended to June 21, 2022. The PDC is ADJOURNED to June 30, 2022 at 11:30 a.m.

Date: May 2, 2022
New York, New York


Mary Kay Vyskocil
United States District Judge

Re: *Garrido v. F&M Construction and Development Corp. et al.*; 21-cv-04084 (MKV)

Dear Hon. Judge Vyskocil,

This office represents Plaintiff, Efren Garrido, and 19 other Opt-In Plaintiffs who have filed consent forms to join this action (collectively, "Plaintiffs"). Pursuant to Your Honor's Individual Rules, kindly accept this correspondence as Plaintiffs' request for an extension of the discovery deadline, currently April 22, 2022, on consent. This is Plaintiffs' second such request. The Court granted Plaintiffs' first request on March 2, 2022 [D.E. 39].

The reason for this request is because paper discovery is not complete and depositions have yet to proceed. This delay is a result of Defendants' continued failure to respond to Plaintiffs' discovery requests, which in turn has prevented the scheduling of depositions. Plaintiffs' unopposed Rule 37 Motion to Compel is currently pending before Your Honor [D.E. 40-42]. Despite filing this motion nearly one month ago, Defendants have still not taken any action to cure their discovery violations.

Accordingly, Plaintiffs respectfully request that the Court extend the discovery deadline from April 22, 2022 up to and including June 21, 2022.

This request affects the Post-Discovery Conference scheduled for May 5, 2022 at 2:30 p.m. Plaintiffs request that this conference be rescheduled to a date and time convenient to the Court.

Thank you for your time and consideration of this request.

Respectfully submitted,



Keith E. Williams, Esq.

cc: all counsel of record via ECF.